

September 14, 2023

MGP File: 21-3130

Town of Caledon
6311 Old Church Road
Caledon, ON L7C 1J6

via email: antonietta.minichillo@caledon.ca / opreview@caledon.ca

Attention: Ms. Antonietta Minichillo
Chief Planner/Director of Planning

Dear Ms. Minichillo:

RE: Future Caledon Official Plan Review Comments
Brookvalley Project Management Inc.
Mayfield West Phase 2 – Stage 3

Malone Given Parsons Ltd. (“MGP”) are the planning consultants for Brookvalley Project Management Inc. (“Brookvalley”), who manage six parcels of land totaling approximately 202 hectares within Phase 2 of the Mayfield West Study Area in the Town of Caledon (the “Brookvalley Lands”).

On behalf of Brookvalley, we have been monitoring the Future Caledon Official Plan review process, including attendance and participation at the Caledon Public Open House held on March 30, 2022 and the Statutory Public Meeting held on April 11, 2022. We also provided written comments to the Town on April 22, 2022.

First, we would like to thank staff for incorporating some of the comments we had previously provided, specifically pertaining to the GTA West Corridor transition policy and the re-designation of a portion of Brookvalley’s Lands from “Prime Agricultural Area” to “Rural Lands” consistent with the Peel Region Official Plan that was approved by the Province in November 2022. On behalf of Brookvalley, we have reviewed the Draft Future Caledon Official Plan (“Draft FCOP”), dated August 2023 and would like to make the following additional comments as it relates to the proposed policy framework and schedules.

1.0 Secondary Plan Areas

The current Draft FCOP does not incorporate the Secondary Plan areas in the policy framework or in the schedules and instead refers back to the policies in the existing Official Plan. It is our understanding that the Draft FCOP is proposed to consist of multiple volumes, with Volume 1 including Town-wide policies and planning designations; Volume 2 including in-effect Secondary Plans; and Volume 3 including all Site and Area Specific Policies. We also understand that the Town will be reviewing the policies for the existing Secondary Plan areas

as part of Phase 3 of their Official Plan Review, however, until then the Secondary Plan areas remain subject to the existing Town of Caledon Official Plan.

It is our opinion that the final Draft FCOP to be presented to Council should incorporate the existing and future Secondary Plan areas into one consolidated document to avoid confusing and conflicting policy language between multiple documents. As is the case with the structure of the City of Markham Official Plan, references to previous official plan documents leads to convoluted policy interpretations that should be avoided with producing one comprehensive document.

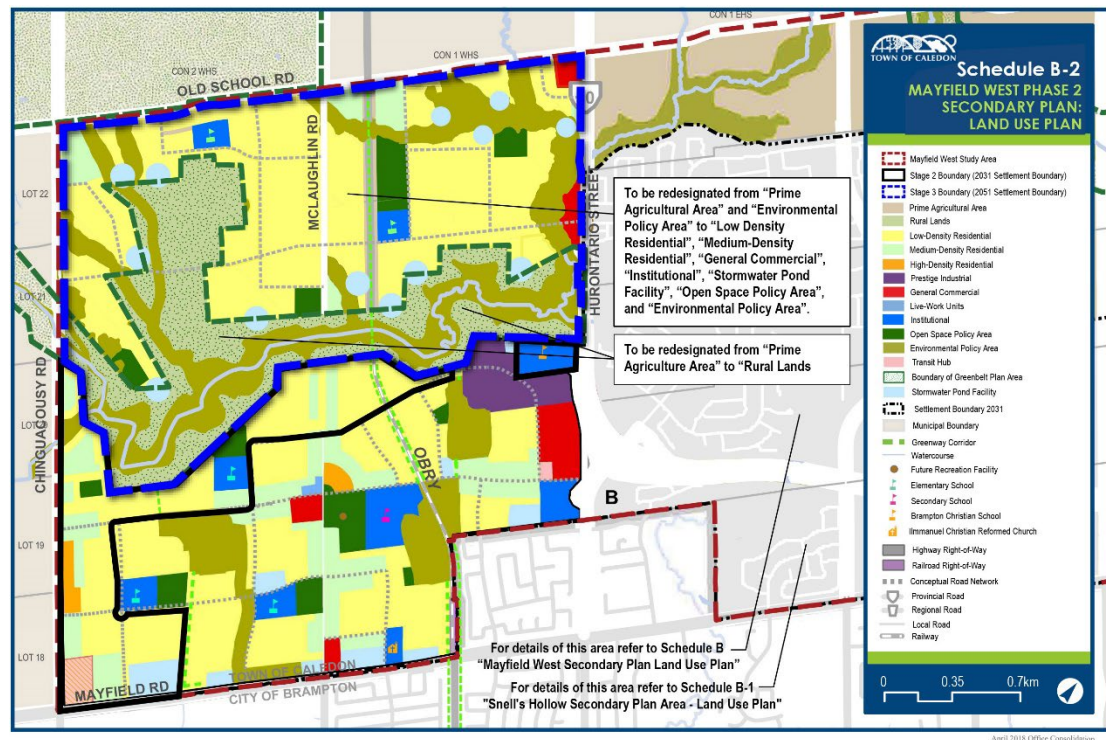
Currently, the Draft FCOP does not support privately initiated Secondary Plans, in accordance with Section 21.4.2. We request that this requirement be omitted from the Draft FCOP or revised to permit privately initiated Secondary Plans on the basis that these Secondary Plans would follow Terms of Reference prepared in collaboration with the Town. Expediting the Secondary Plan process will aid the Town and province in attaining a greater supply of housing units to offset the affordable housing issues stemming from a lack of supply.

Furthermore, in areas where extensive and comprehensive planning has occurred, we do not believe a Secondary Plan process is required to provide detailed land use designations on the New Community Area lands. Brookvalley's lands within the Mayfield West Phase 2 – Stage 3 portion of the Mayfield West Study Area are one such instances, which has a long-standing planning history, has been comprehensively studied and represents the logical completion of existing neighbourhoods and communities. In July 2022, Brookvalley submitted an Official Plan Amendment (“OPA”) Application for their lands known as Mayfield West Phase 2 – Stage 3 which was supported by a number of technical studies.

As such, we request that the Town review the studies undertaken as part of the OPA application and re-designate the lands from “New Community Area” in Schedule F1 – Urban System to “Low Density Residential”, “Medium Density Residential”, “General Commercial”, “Institutional”, “Stormwater Pond Facility”, “Open Space Policy Area”, and “Environmental Policy Area”, as shown in Figure 1 below, to allow for continuity in planning and the logical completion of the Mayfield West Phase 2 community. There has been a sufficient amount of work undertaken for the Mayfield West Phase 2 – Stage 3 lands and as such an additional secondary plan process should not be required.

Moreover, we request that the Town consolidate the three proposed volumes of the Draft FCOP into one comprehensive document, which will include the Mayfield West Phase 2 Secondary Plan policies in the single Draft FCOP document. The Mayfield West Phase 2 Secondary Plan schedule should be subsequently updated and expanded to include the Mayfield West Phase 2 – Stage 3 lands and apply the proposed land use designations as shown on Figure 1.

Figure 1: Proposed Amendment to Schedule B-2



Note: Refinements have been made to the Proposed OPA to reflect the additional review undertaken since the initial submission of the OPA Application in July 2022

2.0 Minister's Zoning Orders

We would like to request that the schedules of the Draft FCOP include the identification of lands that are subject to approved Minister's Zoning Orders ("MZOs"). Furthermore, the Draft FCOP should include a policy that provides direction for when the policies of the Official Plan and the MZO conflict, the provisions in the MZO should prevail and that the development of the lands that are subject to a MZO will occur within the terms of an agreement between the Town and the landowner, as appropriate.

3.0 Transportation

Despite not providing detailed land use designations, the Town has provided a conceptual collector road network for the lands designated as New Community Areas and New Employment Areas on Schedule C1 – Town-wide Transportation Network. Such depiction of the road network should not occur in the absence of detailed land use designations that inform a logical street network. Should the Town continue to illustrate the proposed collector road network on Schedule C1, it should align with the road pattern and configuration delineated in Brookvalley's proposed OPA, as the network was prepared in accordance with the recommendations of the transportation study submitted in support of the OPA application.

It should also be noted that the collector road networks shown on the Brookvalley Lands on Schedule C1 differs from the road network shown on Schedule F1 – Urban System. The road networks, if shown, should also align with each other.

As indicated through the GTA West Corridor consultation process, we request that Route S4-2 be carried forward as the preferred route alternative for Section 4 of the GTA West Corridor, which is included as Attachment A of this letter. We also request that it be modified to straighten the alignment to be north of Old School Road and outside of the Mayfield West Study Area, to avoid limiting the development of the lands at the northwest corner of the Mayfield West Study Area and eliminate the interchange at Chinguacousy Road to provide a more efficient route along the corridor.

4.0 Natural Heritage

The Draft FCOP currently includes several schedules that identify significant environmental feature limits. With respect to the Natural Heritage System policies, we are supportive of the policies included in the Draft FCOP that permit refinement of the Natural Heritage System without amendment to the Official Plan.

It is our opinion that mapping within New Community Areas should be based on site-specific conditions and mapping, where available, in the new Draft FCOP, as is the case for the Brookvalley Lands.

Through our review, the below schedules should ensure alignment with the work provided through Brookvalley's OPA application (which is included in Attachment B):

- Schedule D1 – Natural Environment System
- Schedule D2 – Natural and Supporting Features and Areas
- Schedule D3 – Water Resources System Areas
- Figure D1 – Greenbelt Plan Natural Heritage System

5.0 Growth Management and Phasing

It is our understanding that the Town of Caledon is undertaking a Growth Management and Phasing Plan to determine the staging and sequencing of development. Within the Mayfield West Study Area, the Town and landowners have started to realize Phase 2 Stages 1 and 2. As such, we are continuing to request that the completion of the Mayfield West Phase 2 – Stage 3 community and other areas with a similar long-standing planning history and intention to accommodate growth, including the Bolton Residential Expansion Study Lands (ROPA 30), be prioritized in advance of newer expansion areas to allow for continuity in planning and the logical and sequential completion of the community. Additionally, the services constructed for Phase 2 Stages 1 and 2 have been oversized to accommodate for future growth within the Mayfield West Phase 2 – Stage 3 lands and are available for immediate servicing.

6.0 New Provincial Planning Statement, 2023

Lastly, it is our opinion that the Draft FCOP should be aligned with the new Provincial Planning Statement (2023 PPS). The proposed 2023 PPS intends to consolidate the existing Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe

(the “Growth Plan”). As such, the policies of the Draft FCOP should remove all reference to the Growth Plan, to remain consistent with this new policy direction of the 2023 PPS.

Numerous sections throughout the Draft FCOP directly refer to the Growth Plan as a guiding a document for developing relevant policies and schedules, which should be removed as part of any future Draft or Final FCOP.

We would like to commend staff on their efforts so far and look forward to working with you through the remainder of the Future Caledon Official Plan Review process. If you have any questions or would like to meet to discuss the content of this letter, please do not hesitate to contact me.

Yours very truly,
Malone Given Parsons Ltd.



Matthew Cory, MCIP, RPP, PLE, PMP

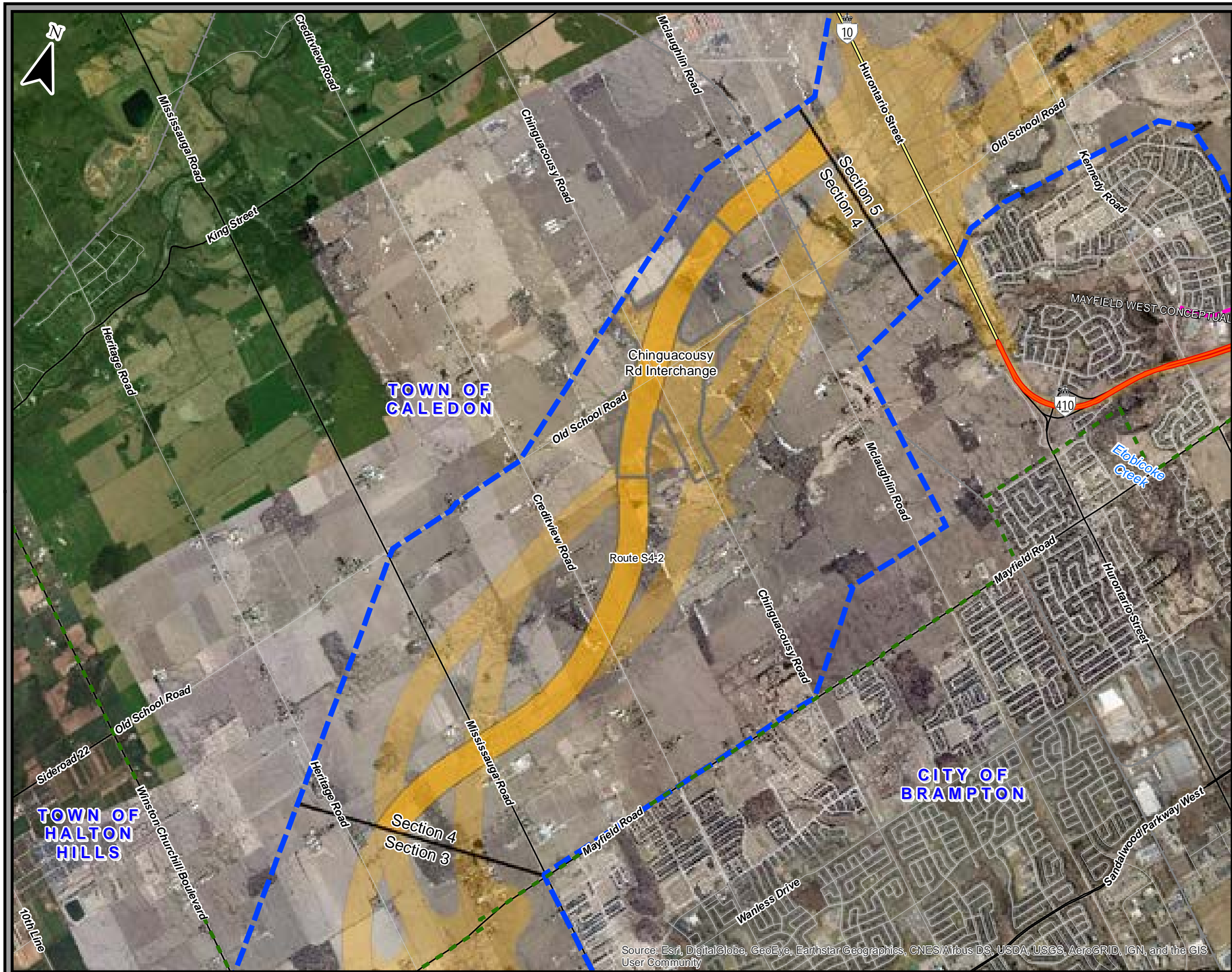
cc: Bailey Loverock, Town of Caledon
Steve Burke, Town of Caledon
Frank Filippo, Brookvalley Project Management Inc.
Nick Cortellucci, Brookvalley Project Management Inc.

Attachments:

Attachment A: Route S4-2, GTA West Corridor

Attachment B: Mayfield West Phase 2 – Stage 3 Significant Environmental Features

2019/08/16
AECOM \\vat113f65001\prod\Aecom\Proj\60347240\900-CAD_GIS\920-929 (GIS\Graphics)\920-ENV\Design\01_Reports\PCMXD\60347240_GTAW_Alternatives_ShortList.mxd



GTA West

Legend

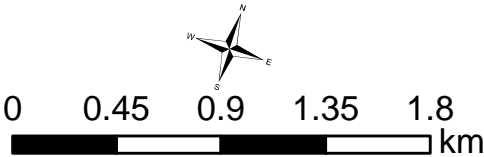
- Railway
- Freeway
- 407 ETR
- Future Highway 427 Extension
- Highway
- Arterial Road
- Local Road
- Section Boundary
- Planned Municipal Improvements
- Municipal Boundary
- Route Planning Study Area
- Featured Route Alternative
- Conceptual Interchange Footprint
- Short List of Route Alternatives

DRAFT

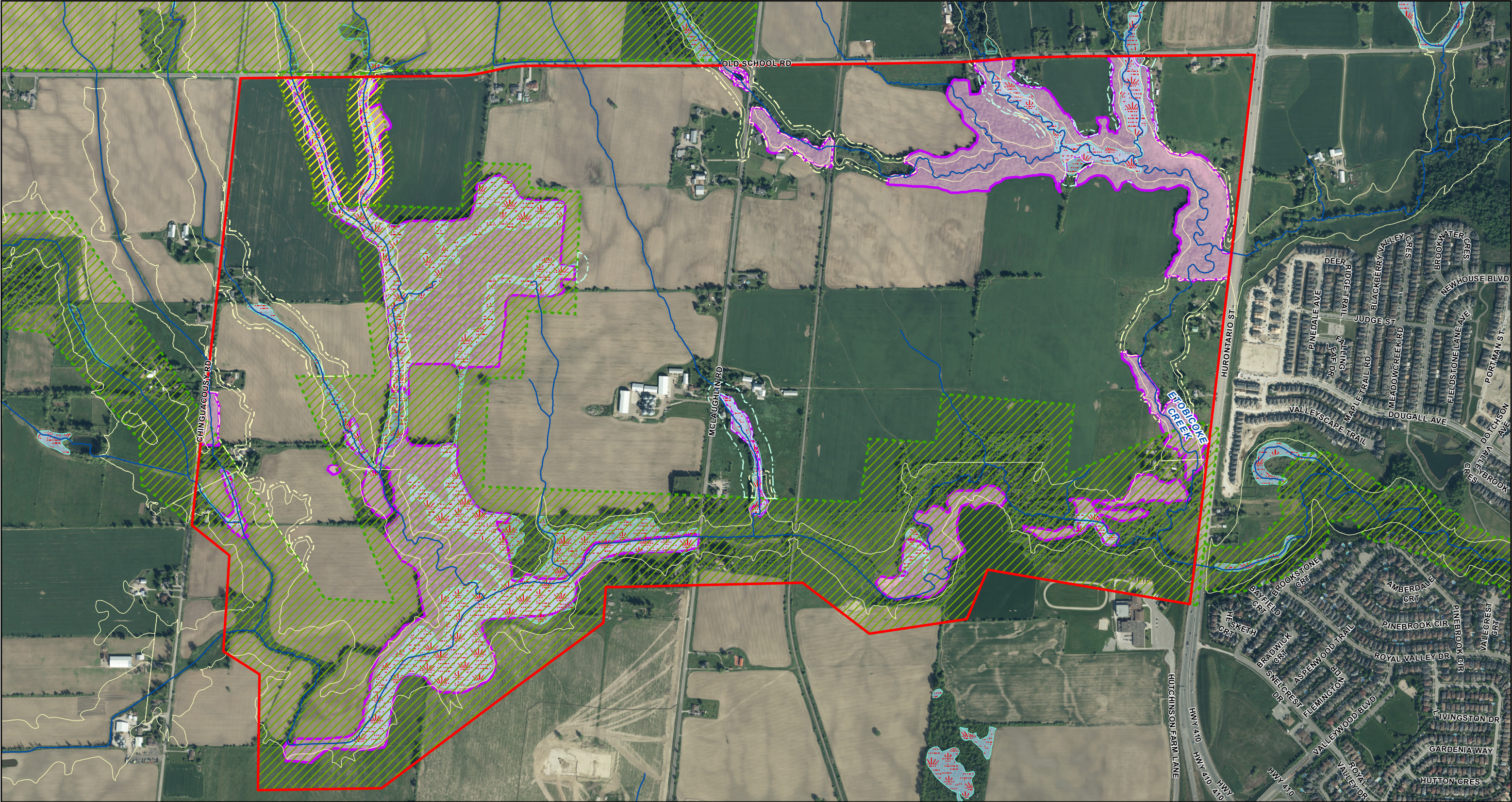
Sources:
Regional Municipality of York, Regional Municipality of Peel, Regional Municipality of Halton, Township of King, City of Vaughan, Town of Caledon, City of Brampton, City of Mississauga, Town of Halton Hills, Town of Milton
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Alternative Route S4-2

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September 2019



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



LEGEND

Watercourse ¹

Wetland: Not Evaluated

Wetland: Evaluated-Provincial

Study Area (NHS)

Woodland and Wetland (feature limits to be staked at EIR stage)

Floodplain ⁴

Floodplain Setback (10 m)

3 - Toronto and Region Conservation Authority (TRCA)

Provincially Significant Wetland Setback (30 m)

Greenbelt NHS ³

Growth Plan NHS

Woodland and Wetland Setback (to be confirmed at EIR stage)

DRAFT

Key Map

0 100 200 300 400

METRE SCALE

North American Datum 1983
Universal Transverse Mercator Projection Zone 17

Scale: 1:10,000
Page Size: Tabloid (11 x 17 inches)

Drawn: SM
Checked: DJ
Date: Jun 29, 2022

Source Notes: Base imagery (2020) provided by Peel region GIS services.

CLIENT	Brooke Valley Homes
PROJECT	Mayfield West Phase 2
TITLE	Significant Natural Heritage Features
REF. NO.	1701602-4-1
	Figure 4